

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

WILMINGTON TRUST, NATIONAL ASSOCIATION, AS TRUSTEE, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> SHREE SAI SIDDHI QUAKERTOWN, LLC, <p style="text-align: center;">Defendant.</p>	: : : : : : : : : : : : :	CIVIL ACTION NO. 2:20-cv-05309
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WILMINGTON TRUST, NATIONAL ASSOCIATION, AS TRUSTEE, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> SHREE SAI SIDDHI KING OF PRUSSIA, LLC, <p style="text-align: center;">Defendant.</p>	: : : : : : : : : : : : :	CIVIL ACTION NO. 2:20-cv-05312
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WILMINGTON TRUST, NATIONAL ASSOCIATION, AS TRUSTEE, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> SHREE SAI SIDDHI WYOMISSING, LLC, <p style="text-align: center;">Defendant.</p>	: : : : : : : : : : : : :	CIVIL ACTION NO. 2:20-cv-05318
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JOINT REPORT OF RULE 26(f) MEETING

In accordance with the Court's Order dated March 25, 2021, and Rule 26(f) of the Federal Rules of Civil Procedure, counsel for the parties conferred on March 29, 2021, and respectfully submit the following report of their meeting for the Court's consideration:

1. Rule 26(a) disclosures shall be completed by April 20, 2021.
2. The parties shall complete fact discovery (including interrogatories, production of documents and depositions of fact witnesses) by August 30, 2021.
3. Expert reports, if any, shall be served on or before August 30, 2021.
4. Rebuttal expert reports, if any, shall be served on or before September 20, 2021.
5. All dispositive motions shall be filed on or before October 20, 2021.
6. Discovery shall include the factual basis for plaintiff's claims, defendant's affirmative defenses and counterclaims and the communications between the parties.
7. The parties do not anticipate any issue regarding the disclosure of electronically stored information.
8. The parties do not anticipate any issue regarding privilege or work product protection that would require a departure from the normal processes permitted by the Federal Rules of Civil Procedure.
9. The parties do not anticipate the need for any changes in discovery available under the Federal Rules of Civil Procedure and the Local Rules.
10. The parties have agreed to submit a mutually acceptable stipulated order that provides for the production and protection of confidential documents and allows the parties to claw back inadvertently produced documents.

11. The parties submit that, insofar as the three related, captioned actions involve different loans and lenders but raise common issues of fact and law, it would be efficient for the Court to issue an Order consolidating the actions for pretrial purposes under the caption for Case No. 2:20-cv-05309.

12. Defendants request a settlement conference before Magistrate Judge Carol Sandra Moore Wells to be scheduled at the Court's earliest convenience after the parties make their initial disclosures pursuant to Rule 26(a) on April 20, 2021.

13. If the settlement conference is not successful, Defendants request mediation in accordance with Local Rule 53.3.

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